



**FINAL ADMINISTRATIVE DECISION  
ILLINOIS PROPERTY TAX APPEAL BOARD**

APPELLANT: James Owen  
DOCKET NO.: 22-56202.001-R-1  
PARCEL NO.: 04-14-200-117-0000

The parties of record before the Property Tax Appeal Board are James Owen, the appellant, by attorney Max E. Callahan, of Siegel & Callahan, P.C. in Chicago; and the Cook County Board of Review.

Based on the facts and exhibits presented in this matter, the Property Tax Appeal Board hereby finds **A Reduction** in the assessment of the property as established by the **Cook** County Board of Review is warranted. The correct assessed valuation of the property is:

**LAND:** \$34,966  
**IMPR.:** \$73,034  
**TOTAL:** \$108,000

Subject only to the State multiplier as applicable.

**Statement of Jurisdiction**

The appellant timely filed the appeal from a decision of the Cook County Board of Review pursuant to section 16-160 of the Property Tax Code (35 ILCS 200/16-160) challenging the assessment for the 2022 tax year. The Property Tax Appeal Board finds that it has jurisdiction over the parties and the subject matter of the appeal.

**Findings of Fact**

The subject property consists of a 1-story dwelling of masonry exterior construction with 3,092 square feet of living area.<sup>1</sup> The dwelling was constructed in 1976 and is approximately 46 years old. Features of the home include a basement with finished area,<sup>2</sup> central air conditioning, a fireplace, and a 3-car garage. The property has an approximately 43,708 square foot site and is

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<sup>1</sup> The parties differ regarding the subject's exterior construction and dwelling size. The Board finds the best evidence of exterior construction is found in the appellant's appraisal which includes photographs depicting masonry exterior construction. The Board finds the best evidence of dwelling size is found in the board of review's evidence as the appraisers did not include any sketch or measurements to support a dwelling size that differs from the county records, nor was the dwelling size reported by the board of review refuted in the appellant's written rebuttal.

<sup>2</sup> The Board finds the best evidence of basement finish and other interior features is found in the appellant's appraisal which includes photographs of the subject's interior based on an inspection of the subject home.

located in Northfield, Northfield Township, Cook County. The subject is classified as a class 2-04 property under the Cook County Real Property Assessment Classification Ordinance.

The appellant contends overvaluation as the basis of the appeal. In support of this argument the appellant submitted an appraisal estimating the subject property had a market value of \$1,175,000 as of January 1, 2022. The appraisal was prepared by Greg S. Fisher, an associate real estate trainee appraiser, and Harry M. Fishman, a certified general real estate appraiser, to determine market value as of January 1, 2022.

Under the sales comparison approach, the appraisers selected three comparable sales located from 0.52 of a mile to 2.9 miles from the subject. The parcels range in size from 34,456 to 48,439 square feet of land area and are improved with 1-story ranch-style or 2-story traditional-style homes of masonry or masonry and frame exterior construction ranging in size from 4,241 to 4,849 square feet of living area. The dwellings range in age from 43 to 84 years old. Two homes have a basement, one of which has finished area. Each home has central air conditioning, one to three fireplaces, and a 2-car or a 3-car garage. Comparables #1 and #2 each have an inground swimming pool. The comparables sold from December 2021 to April 2022 for prices ranging from \$1,130,000 to \$1,250,000 or from \$250.57 to \$284.28 per square foot of living area, including land. The appraisers adjusted the comparables for differences from the subject, including for site size, quality of construction, age, condition, room count, dwelling size, foundation type, basement finish, functional utility, garage size, fireplace count, and pool amenity, to arrive at adjusted prices from \$1,160,725 to \$1,189,840. The appraisers concluded a value for the subject of \$1,175,000 as of January 1, 2022.

Based on this evidence the appellant requested a reduction in the subject's assessment to reflect the appraised value conclusion.

The board of review submitted its "Board of Review Notes on Appeal" disclosing the total assessment for the subject of \$153,942. The subject's assessment reflects a market value of \$1,539,420 or \$497.87 per square foot of living area, including land, when applying the level of assessment for class 2 property under the Cook County Real Property Assessment Classification Ordinance of 10%.

In support of its contention of the correct assessment the board of review submitted information on four comparable sales located on the same block as the subject. The parcels range in size from 40,010 to 53,559 square feet of land area and are improved with 1-story, class 2-04 homes of frame, masonry, or frame and masonry exterior construction ranging in size from 3,627 to 6,506 square feet of living area. The dwellings range in age from 31 to 61 years old. Each home has a basement, central air conditioning, one or two fireplaces, and from a 2.5-car to a 3.5-car garage. Comparable #2 is reported to have other improvements that were not described. The comparables sold from March 2020 to September 2022 for prices ranging from \$1,000,971 to \$2,500,000 or from \$275.98 to \$384.26 per square foot of living area, including land. Based on this evidence the board of review requested the subject's assessment be sustained.

In written rebuttal, the appellant argued the appraisal is the best evidence of market value compared to the raw unadjusted sales data presented by the board of review.

### **Conclusion of Law**

The appellant contends the market value of the subject property is not accurately reflected in its assessed valuation. When market value is the basis of the appeal the value of the property must be proved by a preponderance of the evidence. 86 Ill.Admin.Code §1910.63(e). Proof of market value may consist of an appraisal of the subject property, a recent sale, comparable sales or construction costs. 86 Ill.Admin.Code §1910.65(c). The Board finds the appellant met this burden of proof and a reduction in the subject's assessment is warranted.

The appellant submitted an appraisal and the board of review submitted four comparable sales in support of their respective positions before the Board. The Board gives less weight to the appraised value conclusion which relies on the appraisers' adjustments to the comparables based on an incorrect dwelling size for the subject and where the appraisers selected two comparables that are located more distant from the subject than the other sales in this record. For these reasons, the Board finds the appraisal states a less credible and/or reliable opinion of value and the Board will instead consider the raw sales data in the appraisal and submitted by the board of review.

The record contains a total of seven comparable sales for the Board's consideration. The Board gives less weight to the appraisal sales #1 and #2 which are located more than a mile from the subject. The Board also gives less weight to the board of review's comparables #1, #3, and #4 which sold less proximate in time to the assessment date and/or differ substantially from the subject in dwelling size.

The Board finds the best evidence of market value to be the appraisal sale #3 and the board of review's comparable #2, which sold more proximate in time to the assessment date and are more similar to the subject in location but have varying degrees of similarity to the subject in design, dwelling size, age, site size, and features, suggesting adjustments to these comparables would be needed to make them more equivalent to the subject. These two comparables are much larger homes than the subject but are substantially older homes than the subject. One comparable lacks a basement and one comparable lacks finished basement area, compared to the subject's basement with finished area.

These two comparables sold for prices of \$1,000,971 and \$1,130,000 or \$275.98 and \$266.45 per square foot of living area, including land, respectively. The subject's assessment reflects a market value of \$1,539,420 or \$497.87 per square foot of living area, including land, which is above the two best comparable sales in the record. Based on this record and after considering appropriate adjustments to the best comparables for differences from the subject, such as dwelling size, age, foundation type, and basement finish, the Board finds a reduction in the subject's assessment is justified.

This is a final administrative decision of the Property Tax Appeal Board which is subject to review in the Circuit Court or Appellate Court under the provisions of the Administrative Review Law (735 ILCS 5/3-101 et seq.) and section 16-195 of the Property Tax Code. Pursuant to Section 1910.50(d) of the rules of the Property Tax Appeal Board (86 Ill.Admin.Code §1910.50(d)) the proceeding before the Property Tax Appeal Board is terminated when the decision is rendered. The Property Tax Appeal Board does not require any motion or request for reconsideration.



Chairman



Member



Member



Member



Member

DISSENTING: \_\_\_\_\_

CERTIFICATION

As Clerk of the Illinois Property Tax Appeal Board and the keeper of the Records thereof, I do hereby certify that the foregoing is a true, full and complete Final Administrative Decision of the Illinois Property Tax Appeal Board issued this date in the above entitled appeal, now of record in this said office.

Date: \_\_\_\_\_

September 16, 2025



Clerk of the Property Tax Appeal Board

**IMPORTANT NOTICE**

Section 16-185 of the Property Tax Code provides in part:

"If the Property Tax Appeal Board renders a decision lowering the assessment of a particular parcel after the deadline for filing complaints with the Board of Review or after adjournment of the session of the Board of Review at which assessments for the subsequent year or years of the same general assessment period, as provided in Sections 9-125 through 9-225, are being considered, the taxpayer may, within 30 days after the date of written notice of the Property Tax Appeal Board's decision, appeal the assessment for such subsequent year or years directly to the Property Tax Appeal Board."

In order to comply with the above provision, YOU MUST FILE A PETITION AND EVIDENCE WITH THE PROPERTY TAX APPEAL BOARD WITHIN 30 DAYS OF THE DATE OF THE ENCLOSED DECISION IN ORDER TO APPEAL THE ASSESSMENT OF THE PROPERTY FOR THE SUBSEQUENT YEAR OR YEARS. A separate petition and evidence must be filed for each of the remaining years of the general assessment period.

Based upon the issuance of a lowered assessment by the Property Tax Appeal Board, the refund of paid property taxes is the responsibility of your County Treasurer. Please contact that office with any questions you may have regarding the refund of paid property taxes.

PARTIES OF RECORD

AGENCY

State of Illinois  
Property Tax Appeal Board  
William G. Stratton Building, Room 402  
401 South Spring Street  
Springfield, IL 62706-4001

APPELLANT

James Owen, by attorney:  
Max E. Callahan  
Siegel & Callahan, P.C.  
180 N. Wacker Dr  
Suite 400  
Chicago, IL 60606

COUNTY

Cook County Board of Review  
County Building, Room 601  
118 North Clark Street  
Chicago, IL 60602